



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
WATER

MEMORANDUM

SUBJECT: Recusal Statement

FROM: Karen Dettmer
 Managing Director for Infrastructure Implementation

TO: Radhika Fox
 Assistant Administrator

I have consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This recusal statement formally confirms my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13989 and the Biden Ethics Pledge that I signed.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following entities are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

I am recused from participation in any particular matter that affects Discovery World, a science and technology museum in Milwaukee, which is unlikely to arise during the course of my official duties in the Office of Water.

Because of the current level of my financial ownership, I am disqualified from participating personally and substantially in any particular matter that affects **FiServ** as a specific party. I will remain vigilant and notify OGC/Ethics should my financial situation change.

OBLIGATIONS UNDER THE IMPARTIALITY PROVISIONS

OGC/Ethics has confirmed that I am not subject to the additional Executive Order restrictions for my former employer, which is a local government. Instead, pursuant to the federal impartiality standards, I understand that I instead have a “covered relationship” under 5 C.F.R. § 2635.502(b)(1)(iv). I may not participate in a particular matter involving specific parties in which the **City of Milwaukee** is a party or represents a party unless I am authorized to participate by OGC/Ethics pursuant to 5 C.F.R. § 2635.502(d). This recusal will expire after April 15, 2023.¹

Pursuant to the federal ethics rules, I understand that I also have a covered relationship with my spouse and my spouse’s employer, American Clean Power Association. *See* 5 C.F.R. § 2635.502(b)(1)(ii) and (iii). I will recuse from participating in specific party matters in which my spouse or American Clean Power Association is a party or represents a party, unless I am otherwise authorized by OGC/Ethics to participate, pursuant to 5 C.F.R. § 2635.502(d).

DIRECTIVE AND CONCLUSION

To avoid participating in any of the matters from which I am recused, please refer those matters to the attention of Benita Best-Wong, Deputy Assistant Administrator, without my knowledge or involvement. In the event that my circumstances change, including changes in my financial interests, my personal or business relationships, or my EPA duties, then I will consult with OGC/Ethics and update my recusal statement accordingly.

cc: Benita Best-Wong, Deputy Assistant Administrator
David Risley, Chief of Staff
Justina Fugh, Director, Ethics Office

¹ This recusal obligation does not extend to the following entities, upon which I served only as an *ex officio* member due to my position with the City of Milwaukee and which terminated upon my departure from the City of Milwaukee on April 15, 2022: Menomonee Valley Partners; American Water Works Association; the Water Council; US Water Alliance; Association of Metropolitan Water Agencies; and American Public Works Association.